



February 29, 2024

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By ECF

Hon. Joseph A. Marutollo, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Gilead, et al. v. Safe Chain, et al.*, No. 21-cv-4106 (AMD) (JAM)
Relief Defendant Discovery Deadlines

Dear Judge Marutollo:

We write on behalf of Gilead and Defendants Mohammad Etminan and Everything Pharmacy Related II, Inc. d/b/a Total Remedy and Prescription Center (together with Etminan, the “Total Remedy Defendants”) to provide a joint status report pursuant to Your Honor’s ECF order dated January 31, 2024. Gilead has deposed Mr. Etminan, and settlement negotiations between Gilead and the Total Remedy Defendants are ongoing and have been productive. Should the Court wish to hold a settlement conference, Gilead and the Total Remedy Defendants are available to appear on March 11, 18, and 25 via Zoom.

Respectfully submitted,

/s/ Timothy Waters

Timothy A. Waters

cc: All counsel of record (via ECF)